

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
FORT WAYNE DIVISION**

**LIGTEL COMMUNICATIONS, INC.,**

**Plaintiff,**

**v.**

**BAICELLS TECHNOLOGIES INC.;  
BAICELLS TECHNOLOGIES NORTH  
AMERICA INC.,**

**Defendants.**

**Case No. 1:20-cv-00037-HAB-SLC**

**DECLARATION OF JESSA DEGROOTE IN SUPPORT OF DEFENDANTS’  
RESPONSE IN OPPOSITION TO LIGTEL’S PRE-HEARING MEMORANDUM**

I, Jessa DeGroote, declare under penalty of perjury as follows:

1. I am an attorney duly admitted to practice law in this Court. I am an associate with the law firm of Ice Miller LLP, counsel for Defendants Baicells Technologies Inc. and Baicells Technologies North America Inc. (“Baicells”). I respectfully submit this declaration in support of the Defendants’ Memorandum of Law in Opposition to LigTel’s Motion for a Preliminary Injunction.

2. Attached hereto as Exhibit C is a true and correct copy of an email (LT00534) and attachment (LT000535) from Randy Mead to Josh Wentworth regarding “Bai Cells Facts” dated October 30, 2019.

3. Attached hereto as Exhibit D is a true and correct copy of a thread of emails (LT000669-674) between Wentworth and Huawei regarding “Major SR 2393957 – pooled IP [WITHHELD] on Ligtel LTE 30-Oct-2013” dated December 2013. For personal privacy reasons, the Internet Protocol address has been redacted from this document.

4. Attached hereto as Exhibit E is a true and correct copy of a thread of emails (LT001302-1304) between Wentworth and Huawei regarding “I need to identify a customer for Law Enforcement (SR 12633877)” dated September 2019. For personal privacy reasons, the Internet Protocol address has been redacted from this document.

5. Attached hereto as Exhibit F is a true and correct copy of an email (LT000526) from Wentworth to Mead regarding “Bai Cells sim cards” dated August 1, 2019.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on April 9, 2020 in Bloomington, Indiana.

s/ *Jessa DeGroote*

Jessa DeGroote, Attorney No. 357487-49

ICE MILLER LLP  
One American Square, Suite 2900  
Indianapolis, IN 46282-0200  
Phone: (317) 236-2100  
Fax: (317) 236-2219  
[Jessa.DeGroote@icemiller.com](mailto:Jessa.DeGroote@icemiller.com)

# **EXHIBIT C**

**From:** Randy Mead [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EFC1F5865F1F4BA7992944F97231D9EE-RANDY MEAD]  
**Sent:** 10/30/2019 11:17:12 AM  
**To:** Josh Wentworth [josh@ligtel.net]  
**Subject:** Bai Cells Facts  
**Attachments:** bai cells facts.docx

Randy Mead  
Executive Vice President/General Manager  
Ligonier Telephone/LigTel Communications  
(260)894-9230

"Teamwork is the ability to work together toward a common vision."

**Bai Cells Facts**

1. Bai Cells has been using our HNI code.
2. There are some Bai Cells employees that previously worked at Huawei.
3. One of those employees has specific knowledge of our Huawei network information.
4. We have an attorney that is working with ATIS and IOC to resolve the matter and we have asked a cease and desist order be issued to Bai Cells from IOC.
5. We purchased a Bai Cells SIM card from one of their suppliers and tested it on our network. That test verified Bai Cells is not using our encryption codes.
6. There is a public database where anyone can obtain a list of every HNI code and who it belongs to.

# **EXHIBIT D**

**From:** Robert Jaksa [robert.jaksa@huawei.com]  
**Sent:** 12/5/2013 5:04:14 PM  
**To:** Josh Wentworth [josh@ligtel.net]; Pete Mitchell [pete.ctr.mitchell@huawei.com]; Mir Naziruddin [Mir.Naziruddin@huawei.com]  
**CC:** Mike Troup [mike@ligtel.net]  
**Subject:** RE: Major SR 2393957 - pooled IP [REDACTED] on Ligtel LTE 30-Oct-2013  
**Flag:** Follow up

There was one CDR record opened with IP address of [REDACTED] during the interval specified below (Record #2). Here is a screen capture followed with another screen capture pointing out key data followed with the CDR by itself.

### Summary CDRs with detailed CDR inlaid.

The screenshot shows a software interface for querying CDRs. On the left is a list of record IDs from b00063127 to b00063175. The main window displays a table of records. Record #2 is highlighted, and a detailed view of this record is shown in a pop-up window.

L	recordType	servedIMS	p-GWAddress	chargingID	servingNodeAddress	accessPointName	pdnType	servedPDNAddress	dynamicAddressFlag	recordOpeningTime	duration
1	pGWRecord	{number:31198000000774}	IPBinaryAd...	436464514	IPBinaryAd...	ligtel.lte	0x00 01	IPAddress:IPBinaryAddress:IPBinV4Address: [REDACTED]	TRUE	2013-10-29 20:10:11-04:00	273
2	pGWRecord	{number:31198000000774}	IPBinaryAd...	436464514	IPBinaryAd...	ligtel.lte	0x00 01	IPAddress:IPBinaryAddress:IPBinV4Address: [REDACTED]	TRUE	2013-10-29 20:14:44-04:00	750
3	pGWRecord	{number:31198000000774}	IPBinaryAd...	436464514	IPBinaryAd...	ligtel.lte	0x00 01	IPAddress:IPBinaryAddress:IPBinV4Address: [REDACTED]	TRUE	2013-10-29 20:27:24-04:00	153
4	pGWRecord	{number:31198000000774}	IPBinaryAd...	436464514	IPBinaryAd...	ligtel.lte	0x00 01	IPAddress:IPBinaryAddress:IPBinV4Address: [REDACTED]	TRUE	2013-10-29 20:30:07-04:00	8
5	pGWRecord	{number:31198000000774}	IPBinaryAd...	436464514	IPBinaryAd...	ligtel.lte	0x00 01	IPAddress:IPBinaryAddress:IPBinV4Address: [REDACTED]	TRUE	2013-10-29 20:30:15-04:00	11
6	pGWRecord	{number:31198000000774}	IPBinaryAd...	436464514	IPBinaryAd...	ligtel.lte	0x00 01	IPAddress:IPBinaryAddress:IPBinV4Address: [REDACTED]	TRUE	2013-10-29 20:30:26-04:00	12
7	pGWRecord	{number:31198000000774}	IPBinaryAd...	436464514	IPBinaryAd...	ligtel.lte	0x00 01	IPAddress:IPBinaryAddress:IPBinV4Address: [REDACTED]	TRUE	2013-10-29 20:30:38-04:00	13
8	pGWRecord	{number:31198000000774}	IPBinaryAd...	436464514	IPBinaryAd...	ligtel.lte	0x00 01	IPAddress:IPBinaryAddress:IPBinV4Address: [REDACTED]	TRUE	2013-10-29 20:30:51-04:00	10

**Record #2 Details:**

- File: b00063134.dat
- CDR type: Second copy of final CDR
- Browser type: backwareMerge\_PCW\_CDR
- Channel name: pgwcd
- Location of the current record: 2
- recordType: pGWRecord
- servedIMS: {number:31198000000774}
- p-GWAddress: IPBinaryAddress:IPBinV4Address: 10.212.5.12
- chargingID: 436464514
- servingNodeAddress: IPBinaryAddress:IPBinV4Address: 10.212.5.12
- accessPointName: ligtel.lte
- pdnType: 0x00 01
- servedPDNAddress: IPAddress:IPBinaryAddress:IPBinV4Address: [REDACTED]
- dynamicAddressFlag: TRUE
- listOfOffices: -
- recordOpeningTime: 2013-10-29 20:14:44-04:00
- duration: 750
- causeForRecordClosing: volumeLimit
- diagnostics: -
- recordSequenceNumber: 5232

### Summary CDRs with detail CDR inlaid—marked up.

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recordType	serveIMS	p-GWAddress	chargingID	servingNode...	access...	pdnPDN...	servedPDNAddress	dyn...	recordOpeningTime	duration
pGWRecord	{number:31198000000774}	IPBinaryAd...	436464514	IPBinaryAd...	lgtel.lte	0x00 01	IPAddress:IPBinaryAddress:IPBinV4Address	TRUE	2013-10-29 20:10:11 -04:00	273
pGWRecord	{number:31198000000774}	IPBinaryAd...	436464514	IPBinaryAd...	lgtel.lte	0x00 01	IPAddress:IPBinaryAddress:IPBinV4Address	TRUE	2013-10-29 20:14:44 -04:00	760
pGWRecord	{number:31198000000774}	IPBinaryAd...	436464514	IPBinaryAd...	lgtel.lte	0x00 01	IPAddress:IPBinaryAddress:IPBinV4Address	TRUE	2013-10-29 20:27:24 -04:00	163
pGWRecord	{number:31198000000774}	IPBinaryAd...	436464514	IPBinaryAd...	lgtel.lte	0x00 01	IPAddress:IPBinaryAddress:IPBinV4Address	TRUE	2013-10-29 20:30:07 -04:00	5
pGWRecord	{number:31198000000774}	IPBinaryAd...	436464514	IPBinaryAd...	lgtel.lte	0x00 01	IPAddress:IPBinaryAddress:IPBinV4Address	TRUE	2013-10-29 20:30:15 -04:00	11
pGWRecord	{number:31198000000774}	IPBinaryAd...	436464514	IPBinaryAd...	lgtel.lte	0x00 01	IPAddress:IPBinaryAddress:IPBinV4Address	TRUE	2013-10-29 20:30:26 -04:00	12
pGWRecord	{number:31198000000774}	IPBinaryAd...	436464514	IPBinaryAd...	lgtel.lte	0x00 01	IPAddress:IPBinaryAddress:IPBinV4Address	TRUE	2013-10-29 20:30:38 -04:00	13
pGWRecord	{number:31198000000774}	IPBinaryAd...	436464514	IPBinaryAd...	lgtel.lte	0x00 01	IPAddress:IPBinaryAddress:IPBinV4Address	TRUE	2013-10-29 20:30:51 -04:00	10

  

File: b00063134.dat

CDR type: Second copy of final CDR

Browse type: backsaveNoMerge\_PGW-CDR

Channel name: pgsedr

Location of the current record: 2

```

recordType: pGWRecord
serveIMS: {number:31198000000774}
p-GWAddress: IPBinaryAddress:IPBinV4Address:10.212.5.12
chargingID: 436464514
servingNodeAddress: IPBinaryAddress:IPBinV4Address:10.212.5.12
accessPointName: lgtel.lte
pdnPDNType: 0x00 01
servedPDNAddress: IPAddress:IPBinaryAddress:IPBinV4Address:
dynamicAddressFlag: TRUE
listOfTrafficVolumes:
recordOpeningTime: 2013-10-29 20:14:44 -04:00
duration: 760
causeForRecClosing: volumeLimit
diagnostics:
recordSequenceNumber: 5333

```

Number of: 50

Query CDR Export CDR Update CDR

## Detailed CDR only.

File: b00063134.dat

CDR type: Second copy of final CDR

Browse type: backsaveNoMerge\_PGW-CDR

Channel name: pgsedr

Location of the current record: 2

```

recordType: pGWRecord
serveIMS: {number:31198000000774}
p-GWAddress: IPBinaryAddress:IPBinV4Address:10.212.5.12
chargingID: 436464514
servingNodeAddress: IPBinaryAddress:IPBinV4Address:10.212.5.12
accessPointName: lgtel.lte
pdnPDNType: 0x00 01
servedPDNAddress: IPAddress:IPBinaryAddress:IPBinV4Address:
dynamicAddressFlag: TRUE
listOfTrafficVolumes:
recordOpeningTime: 2013-10-29 20:14:44 -04:00
duration: 760
causeForRecClosing: volumeLimit
diagnostics:
recordSequenceNumber: 5333
nodeID: isp.com
recordExtensions:
localSequenceNumber: 187970507
sgnSelectionMode: sgnNetworkProvideSubscriptionVerified
serveIMSISDN: {number:31198000000774}
chargingCharacteristics: Normal billing
chksSelectionMode: servingNodeSupplied
imsSignalingContext:
externalChargingID:
servingNodePLMNIdentifier: 311980
pSFurnishChargingInformation:
serveIMSISV:
rATType: 6
sTimezone: GMT-04:00;+1 hour DST
userLocationInformation: 0x13 13 01 89 00 00 13 01 89 00 07 03 07
camelChargingInformation:
listOfServiceData:
servingNodeType: [GPSGW]
servedNNAI:
p-OPPLMNIdentifier:
startTime:
stopTime:
serve43ppcMEID:

```

First Previous Next Last End Go to



Robert Jaksa / Huawei  
Mobile: +1 214-870-0212  
Email: robert.jaksa@huawei.com  
VOIP: 0011 214-870-0212

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**From:** Josh Wentworth [mailto:josh@ligtel.net]  
**Sent:** Thursday, December 05, 2013 3:02 PM  
**To:** Robert Jaksa; Pete Mitchell; Mir Naziruddin  
**Cc:** Mike Troup  
**Subject:** RE: Major SR 2393957 - pooled IP [REDACTED] on Ligtel LTE 30-Oct-2013

There was some confusion on dates from the phone call with the officer and the subpoena that we received. I need a screenshot of the CDR's for the following times for IP address [REDACTED]

I need from 8:14-8:17pm eastern on October 29<sup>th</sup> (00:14-00:17UTC – October 30th). This is the information that was specifically requested in the subpoena that we got this afternoon. We would like this information by noon tomorrow so we can respond quickly to this law enforcement request.

Thanks guys.

Joshua Wentworth  
Network Administrator  
Ligtel Communications/Ligonier Telephone  
260-894-7161

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**From:** Robert Jaksa [mailto:robert.jaksa@huawei.com]  
**Sent:** Wednesday, December 04, 2013 7:38 PM  
**To:** Josh Wentworth; Pete Mitchell; Mir Naziruddin  
**Cc:** Mike Troup  
**Subject:** RE: Major SR 2393957 - pooled IP [REDACTED] on Ligtel LTE 30-Oct-2013

Hello Josh,

The process of identifying the IMSI(s) was pretty involved because the requested data was more than 7 days old. If the requested data were 7 days old or less, we could have used the CG's built in CDR browsing interface (<http://192.168.250.6>). This is what we probably went over a long time ago during acceptance testing.

If the data is more than 7 days old, it requires quite a bit of manual work to first find the relevant CDR data files and then to search the CDRs. The particular tool I used for searching the CDR files is restricted to Huawei engineers and can only process 5 CDR files at a time. Since there were 175 final CDR files generated on Oct 30, we performed the IP address search 35 times. The results from one of those searches is shown in the screen capture below.

Of course, third-party software and billing providers can also process the CG's CDR files... typically for billing purposes but the software/providers should work for requests like this as well. In this scenario, we would push or pull the CG's CDR files to the FTP server used by the billing software/provider each day.

---

Robert Jaksa / Huawei  
Mobile: +1 214-870-0212  
Email: [robert.jaksa@huawei.com](mailto:robert.jaksa@huawei.com)  
VOIP: 0011 214-870-0212

**From:** Josh Wentworth [mailto:josh@ligtel.net]

**Sent:** Wednesday, December 04, 2013 1:59 PM

**To:** Pete Mitchell; Mir Naziruddin; Robert Jaksa

**Cc:** Mike Troup

**Subject:** RE: Major SR 2393957 - pooled IP [REDACTED] on Ligtel LTE 30-Oct-2013

I would love to know how to collect this information without having to contact Huawei. Robert, I think we might have went through this a year or two ago but if there's any way Huawei could provide documentation on what we need to do then we could handle this task internally. Thanks much guys.

Joshua Wentworth  
Network Administrator  
Ligtel Communications/Ligonier Telephone  
260-894-7161

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**From:** Pete Mitchell [mailto:pete.ctr.mitchell@huawei.com]

**Sent:** Wednesday, December 04, 2013 2:50 PM

**To:** Josh Wentworth

**Subject:** FW: Major SR 2393957 - pooled IP [REDACTED] on Ligtel LTE 30-Oct-2013

Josh,

Found what you are looking for. Below you will see the IMSI that was traced back to that IP address on 30-Oct-2013.

With your permission I will move the Huawei SR to closure. The data contained below will not be included in the archive of the SR itself.

Thanks,  
Pete Mitchell

**CDMA/LTE TAC Engineer**

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**From:** Robert Jaksa

**Sent:** Tuesday, December 03, 2013 11:01 PM

**To:** Pete Mitchell

**Cc:** Mir Naziruddin; Michael boroden; Tim Danks

**Subject:** RE: Major SR 2393957 - pooled IP [REDACTED] on Ligtel LTE 30-Oct-2013

There are hundreds of Ligtel charging records tying IMSI 31198000000774 to the allocated IP address [REDACTED] on Oct. 30 2013 and based on these charging records no other IMSIs were allocated that IP address on Oct. 30 2013.

The process to determine this is involved. Due to the sensitivity of the data and process itself, I need permission from Boroden and/or Danks before divulging how to do this. A screenshot showing many "key" charging records is below.

File(F) Query(Q) Set(S) Help(H)

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recordType	serverIP	p-GWAddress	chargingID	serverIPAd...	access...	pdvPDN...	serverIPDPPNAddress	dyn...	recordOpeningTime
1	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:11:15
2	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:13:31
3	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:13:42
4	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:13:49
5	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:13:55
6	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:14:01
7	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:14:08
8	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:14:15
9	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:14:24
10	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:14:25
11	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:14:36
12	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:14:42
13	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:14:53
14	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:14:59
15	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:15:05
16	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:15:11
17	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:15:19
18	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:15:27
19	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:15:36
20	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:15:44
21	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:15:55
22	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:16:03
23	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:16:12
24	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:16:20
25	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:16:27
26	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:16:33
27	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:16:40
28	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:16:46
29	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:16:53
30	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:17:00
31	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:17:08
32	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:17:15
33	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:17:21
34	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:17:28
35	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:17:34
36	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:17:40
37	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:17:48
38	pgWRecord	(number:31198000000774)	PBinaryAd...	436-64514	(PBinaryAd...	lgTelIte	0x00 01	IPAddress:PBinaryAddress:PBinV4Address	TRUE - 2013-10-30 20:17:49

40 records on 1 pages    Current Page: 1    Print page    Previous page    Next page    Last page    1    Go to

Number of: 50    Query CDR    Export CDR    Update CDR

Robert Jaksa / Huawei  
 Mobile: +1 214-870-0212  
 Email: [robert.jaksa@huawei.com](mailto:robert.jaksa@huawei.com)  
 VOIP: 0011 214-870-0212

**From:** Pete Mitchell  
**Sent:** Tuesday, December 03, 2013 3:44 PM  
**To:** Robert Jaksa  
**Cc:** Mir Naziruddin  
**Subject:** RE: Major SR 2393957 - pooled IP [REDACTED] on LigTel LTE 30-Oct-2013

Robert,

Yes, please help, but also let me know the steps you performed to find this data.

Thanks,  
 Pete Mitchell  
**CDMA/LTE TAC Engineer**

**From:** Robert Jaksa  
**Sent:** Tuesday, December 03, 2013 3:26 PM  
**To:** Pete Mitchell  
**Cc:** Mir Naziruddin  
**Subject:** RE: Major SR 2393957 - pooled IP [REDACTED] on LigTel LTE 30-Oct-2013

You will need to look through the charging records. Do you want me to look into this?

---

Robert Jaksa / Huawei  
Mobile: +1 214-870-0212  
Email: [robert.jaksa@huawei.com](mailto:robert.jaksa@huawei.com)  
VOIP: 0011 214-870-0212

---

**From:** Pete Mitchell  
**Sent:** Tuesday, December 03, 2013 2:38 PM  
**To:** Robert Jaksa  
**Cc:** Mir Naziruddin  
**Subject:** Major SR 2393957 - pooled IP [REDACTED] on Ligtel LTE 30-Oct-2013

Hi Robert,

Talked to Josh Wentworth minutes ago ... he is anticipating a law enforcement subpoena to discover which IMSI in his LTE subscriber base was allocated IP address [REDACTED] on Oct.30 2013. Josh has said that the DHCP server was involved, and that the M2000 would be able to show who had that IP on that day. Can you help? Let me know how we can find this out.

Thanks,  
Pete Mitchell  
**CDMA/LTE TAC Engineer**  
Huawei USA | 5700 Tennyson Parkway Suite 500, Plano TX  
75024  
DESK: +1 214-919-6534 |  
EMAIL: [pete.ctr.mitchell@huawei.com](mailto:pete.ctr.mitchell@huawei.com)  
TAC HOTLINE: +1 877-448-2934



# **EXHIBIT E**

**From:** Christopher Maguigad [cmaguiga@huawei.us]  
**Sent:** 9/11/2019 2:14:57 PM  
**To:** Josh Wentworth [josh@ligtel.net]  
**CC:** John Jiang [jjiang@huawei.us]; Sugumar Rajarathinam [srajarat@huawei.us]; William Zheng [xzheng@huawei.us]; Allan Elvambuena [aelvambu@huawei.us]  
**Subject:** RE: I need to indentify a customer for Law Enforcement (SR 12633877)

Thanks Josh. Appreciate it.

Regards,  
Chris

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**From:** Josh Wentworth <josh@ligtel.net>  
**Sent:** Wednesday, September 11, 2019 1:11 PM  
**To:** Christopher Maguigad <cmaguiga@huawei.us>  
**Cc:** John Jiang <jjiang@huawei.us>; Sugumar Rajarathinam <srajarat@huawei.us>; William Zheng <xzheng@huawei.us>; Allan Elvambuena <aelvambu@huawei.us>  
**Subject:** RE: I need to indentify a customer for Law Enforcement (SR 12633877)

Yes, thank you.

Joshua Wentworth  
Network Operations Supervisor  
Ligtel Communications/Ligonier Telephone  
260-894-7161

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**From:** Christopher Maguigad <cmaguiga@huawei.us>  
**Sent:** Wednesday, September 11, 2019 12:20 PM  
**To:** Josh Wentworth <josh@ligtel.net>  
**Cc:** John Jiang <jjiang@huawei.us>; Sugumar Rajarathinam <srajarat@huawei.us>; William Zheng <xzheng@huawei.us>; Allan Elvambuena <aelvambu@huawei.us>  
**Subject:** RE: I need to indentify a customer for Law Enforcement (SR 12633877)

Hi Josh,

May we have the permission to please close this ticket?  
Thanks.

Regards,  
Chris

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**From:** Josh Wentworth <josh@ligtel.net>  
**Sent:** Monday, September 09, 2019 6:13 PM  
**To:** Christopher Maguigad <cmaguiga@huawei.us>  
**Cc:** John Jiang <jjiang@huawei.us>; Sugumar Rajarathinam <srajarat@huawei.us>; William Zheng <xzheng@huawei.us>; Allan Elvambuena <aelvambu@huawei.us>  
**Subject:** Re: I need to indentify a customer for Law Enforcement (SR 12633877)

Thanks much. Sorry, it's been a crazy day.

On Sep 9, 2019, at 6:55 PM, Christopher Maguigad <cmaguiga@huawei.us> wrote:

Hi Josh,

As you have requested. Please see attach and below. IMSI 311980000000426 that uses the said IP Address [REDACTED] on September 9, 2019 this morning according to CDR files.

<image002.jpg>

Thanks.

Regards,  
Chris

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**From:** Josh Wentworth <josh@ligtel.net>  
**Sent:** Monday, September 09, 2019 1:24 PM  
**To:** Christopher C Maguigad <christopher.c.maguigad@huawei.com>  
**Cc:** John Jiang <jjiang@huawei.us>; Sugumar Rajarathinam <srजारат@huawei.us>; Xiaowen Zheng (William Zheng, USA TAC) <william.zheng@huawei.com>; Allan Elvambuena <aelvambu@huawei.us>  
**Subject:** RE: I need to indentify a customer for Law Enforcement (SR 12633877)

I don't have the IMSI, I have the IP address. The time would be this morning, 9/9/2019. I have not yet gotten the search warrant yet but we are getting things started early. If you can get me the IMSI from the IP address that's all I need. The IP is:

[REDACTED]

Thanks much.

Joshua Wentworth  
Network Operations Supervisor  
Ligtel Communications/Ligonier Telephone  
260-894-7161

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**From:** Christopher C Maguigad <christopher.c.maguigad@huawei.com>  
**Sent:** Monday, September 9, 2019 12:11 PM  
**To:** Josh Wentworth <josh@ligtel.net>  
**Cc:** John Jiang <jjiang@huawei.us>; Sugumar Rajarathinam <srजारат@huawei.us>; Xiaowen Zheng (William Zheng, USA TAC) <william.zheng@huawei.com>; Allan Elvambuena <aelvambu@huawei.us>  
**Subject:** I need to indentify a customer for Law Enforcement (SR 12633877)

Hi Josh,

May I know the IMSI and the time you need for this UE? Also, can you please provide me the login information for the CG?

Thanks.

Regards,  
Chris

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<CDR list for Law Enforcement.xlsx>

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# **EXHIBIT F**

**From:** Josh Wentworth [josh@ligtel.net]  
**Sent:** 8/1/2019 9:47:41 AM  
**To:** Randy Mead [rmead@ligtel.net]; Mike Troup [mike@ligtel.net]  
**Subject:** Bai Cells sim cards

There are no records from the trace. Looks like it denied on crypto.

Joshua Wentworth  
Network Operations Supervisor  
Ligtel Communications/Ligonier Telephone  
260-894-7161